

## Privacy Policy

**Last updated: 11.11.18**

Welcome to Onedeeds!

We, Onedeeds Inc. ("Onedeeds", "we", "our" or "us"), highly value and respect your privacy and therefore we are investing great efforts and resources in order to optimize your privacy.

This privacy policy ("Policy"), incorporated into our Terms of Service <https://storage.googleapis.com/www.onedeeds.com/assets/Terms%20of%20Service.pdf>, outlines the information we collect when you ("you" or "your") access and use our Services provided by us (which, together, are referred to as the "Services"), how we protect your information, how we use it and for what purposes.

**By accessing or using our Services, you agree to this Policy and to our Terms of Service. Therefore, please take a moment to familiarize yourself with the Policy before using our Services. If you do not agree to this Policy or Terms of Service, you shall not access or otherwise use our Services or any information contained herein.**

If you are a European Union resident or using the Services within the European Economic Area, we advise you to familiarize yourself also with your rights set forth in Regulation (Eu) 2016/ 679 Of The European Parliament and Of The Council (also known as the GDPR) which you may find at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN> .

As a user-generated community platform, our Services allow you to submit, upload, post or broadcast content (including without limitation information, video, sounds, images, photos, clips, musical works, works of authorship, usernames, data, notes, text, documents, files, messages, signs, symbols, icons, drawings, animation, graphics, charts, designs, scripts, code, audio, comments, software, applications, links, and other materials) via third-party platforms, e.g. Facebook or Instagram ("Third-Party Platforms").

Naturally, anything that you or other users submit, upload, post, broadcast or otherwise make available, to us or to others, on our Services, may be "personally identifiable" (meaning it can be used to specifically identify you as a natural person) ("**Data**") or "non-personally identifiable information" (meaning it can't be used to specifically identify you). We process both types of information, and combinations of both types, as described above.

**We advise you to exercise caution and common sense when sharing, submitting, uploading, posting, broadcasting or otherwise using the Services.**

We will collect the information that may identify you on the basis of your consent or without your consent if:

- the Data is required for rendering the Services to you;
- the Data is required for complying with legal obligations, such as a court order or in response to the authorities;
- the Data is required for Our legitimate purposes (or the legitimate purposes of those acting in Our behalf) which will be broadly described below under the "How We Use the Data We Collect and Store and for what Purposes" section.

If you reside or are using the Services in a territory governed by privacy laws which determine that consent is the only legal basis for the processing of the Data, by using the Services you hereby consent to the processing of the Data for all purposes detailed in this Policy.

## What Data we collect?

We collect your **name** and **last name** and your **email address**, as you chose to provide them upon your registration to our Services. If you chose to register to the Services through a Third-Party Platform, we will collect the name, last name and email associated with your account on such Third-Party Platform.

When using our website, we use “cookies” – a small text file that is sent to your browser – solely for the purpose of saving you the trouble of logging in every time you visit us. You may simply delete the cookies at any time through your browser settings.

In addition, although we do not systematically store and process your User Content, we may occasionally use such User Content on an ad-hoc basis for the purposes described hereunder and in accordance with the Terms of Service.

We may also gather statistical and aggregated information originating from our users which may be combined with additional non-identifiable information collected from other sources, regarding the use of the Services. This information will be anonymous and will not allow, by reasonable means, to identify – or to be attributed to – a specific user. We will use this information for the purposes of internal research and development, and we also may share it with our business partners, affiliates or other third parties including advisors, advertisers and investors, for the purpose of conducting a general business analysis.

**Be aware that any other User Content (as defined in the Terms of Service) that you provide, will neither be collected, processed or stored by us, but may be processed and stored by the Third-Party Platforms through which you share them.**

## How We Use the Data We Collect and Store and for what Purposes

We will store and process your information for the following purposes:

- A. **Ongoing operation and performance of the Services and our Internal Course of Business** – for example, for recognizing you as members of the Onedeeds community or allow you to remain logged-in.
- B. **Support and communication with users** – e.g. to contact you in order to provide the most efficient support.
- C. **Marketing or advertising our Services** – we may send you newsletters, updates, marketing materials and other information that may interest you by e-mail and/or via mobile devices.
- D. **Compliance with the law** –to protect Onedeeds and its users and in order to comply with all applicable laws, regulations and legal processes, protect your privacy, prevent illegal activities, enforce applicable terms of service and protect Onedeeds and Onedeeds users’ rights.

**E. Additional legitimate interests including:**

- Preventing and responding to fraud, inappropriate use or abuse of the Services;
- Preventing or addressing technical or security issues;
- Fulfilling our commitments to our partners or other third-parties;
- Internal research for the purpose of evaluating the use of the Services, developing new features to our Services and improving user experience;
- Marketing to you or advertising of our Services;
- Ensuring the protection of our rights, security and property (and those of our partners, contractors and users);
- Various legal purposes, such as the establishment, exercise or defense of a legal claim.

## **Sharing of information**

### **Your Sharing of Data**

Our Services, are naturally aimed for sharing. This is most significantly reflected by the fact that we render the Services on Third-Party Platforms, and mainly social networks.

However, this does not mean that you have to share every use of our Services. You can always control what you share and with whom you share it before any such sharing, simply by changing the account settings on the applicable Third-Party Platform.

### **Our Sharing of Data**

**We will not share your Personal Information with third parties, except in the following instances:**

**A. When we have received your permission.** This includes sharing information as described in this Policy or otherwise with other services (like Facebook) when you have chosen to link those services to your account or publish your activity on our Services to them.

**B When we engage third parties to process Data on our behalf.** Such third parties' use will be subject to our explicit instructions and in compliance with this Policy. For example, we may provide Data to a contractor who will provide support on our behalf.

**C. With our affiliates.** This relates to entities that are legally part of the same group of companies that we are part of, or that become part of that group.

**D. In case of a change of control.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding, we may transfer the information to our new owner.

**E. (i) As a response to a legal request** (such as a court order, search warrant or subpoena) if we believe that we are required to do so by any applicable law; or **(ii) when we believe that such disclosure or use is necessary** in order to: reveal, prevent and address fraud and other illegal activities; enforce this Policy or our Terms of Service, including in order to investigate potential breaches thereof; protect our rights, property or safety, or those of our users or members of the public from harm, as required or permitted by applicable law; and prevent death or imminent bodily harm.

**G. Non-Personally Identifiable Information.** We may also share aggregated or non-personally identifiable information that we collect and share as broadly described above under “what data we collect” section.

## **What are your rights regarding the Data?**

**Access to the Data** – since most of your personal information is provided by you, mainly through your Third-Party Platform accounts, you have full access to your Data.

**Rectification of the Data** – you can change or amend your Data any time by editing your social network profile. You are responsible to make all necessary changes to correct any information in your account which is inaccurate, incomplete or outdated. Please keep in mind that false, incorrect, or outdated information may prevent you from registering to our Services and impair our ability to provide you with Services. If you have a reason to believe we possess incorrect Data relating you, you may request the amendment of such Data.

**Deletion of Data** – you may contact us at all times with a request to delete your Data. We will comply with this request and delete any Data which is associated with you to the extent possible. However, you should be aware that we use backup systems in which your data is stored without the ability to delete it immediately upon request. Therefore, we may require an additional short period of time until we are able to fully delete all traces of your Data.

Nonetheless, for legal reasons, organizational reasons or in order to prevent fraud, we may retain certain specific information relating to you. In any event, your request for deletion will be recorded and will not be deleted.

In addition, under certain circumstances you may have the right to object to the processing of the Data and to export certain Data to another service.

## **How we retain your Data**

We will retain the Data only as long as it is required for the fulfillment of the purposes stated in this Policy. Some Data will be deleted automatically – e.g. if it is no longer required for the fulfillment of the purpose for which it has been collected or Data that is no longer relevant or if you have terminated your account– and some Data will be deleted upon your request – e.g. Data that you directly provided to us and wish to erase.

Certain regulatory, legal or organizational requirements may require the retention of specific Data for longer periods of time. This includes:

- Data which is required to prevent fraud or abuse of our Services;
- Data which is required for our internal security purposes;
- Data which needs to be retained for bookkeeping and accounting purposes, in order to comply with legal or regulatory requirements or to exercise any legal right.

We will retain the minimum Data required for those purposes.

## **How Do We Secure Your Information?**

We consider data security a top priority and we do our best to keep your Personal Information secure. For that purpose, we Practice administrative, technical, and physical security procedures to help protect the information you provide us.

Although we take organizational, technical and administrative measures to protect your Data, no method of transmitting or storing electronic data is ever completely secure. Therefore, you cannot reasonably expect and we cannot promise or guarantee that such information will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse. Please be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to their standard terms and conditions that are generally non-negotiable, and accordingly, we may be unable to impose contractual obligations on them with respect to the measures they use to protect Personal Information.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contact Us" section below.

## **External Links and Third Party Services**

Our Services may contain links to third party sites or other apps or services that are not owned or operated by Onedeeds. Similarly, it is possible that you will use other services to interact or interface with our Services (e.g. accessing our Services via your social network account). This Privacy Policy only applies to Onedeeds' Services and does not apply to any third party sites, apps, platforms or any other service. We are not responsible for the privacy practices or terms of such other third parties even if our name and logo appear on the screen. We recommend that you review the privacy policies of such third parties (including social network) before you use any apps or services they offer.

Further, all the payments you make as part of the Services are executed by Stripe (or another similar defrayment company), which is an online payment processor, and Onedeeds has neither control over, nor ability to intervene in the process of the payment. Accordingly, we do not collect any information you provide in the process of the payment, including your credit card details. Therefore, if you have any inquiry or request with respect to Data that been provided during the payment process, you should address them to Sprite (or the applicable defrayment company used by Onedeeds at such time).

## **Transfer of Data**

By using the Services you hereby provide your consent to the transfer of your Data outside of your country.

If you reside in, or are accessing the Services from, the European Union, you should know that most of the processing of your Data takes place within the European Union or in territories recognized by the EU Commission as providing adequate protection to your Data.

The above notwithstanding, we may transfer, process and store your Data also in territories which have yet to be recognized by the EU Commission as providing adequate protection to

your Data. However, we will do so only after we have verified that your Data will remain protected, and by using the Services you hereby consent to such transfer, processing or storage.

In addition, please note that your information is stored on servers maintained by third party service providers. We ensure the compliance of these third parties with the requirements of the appropriate privacy protection regulations.

## **Protection of Children's Privacy**

Our Services are not directed to children under the age of 18.

IF YOU ARE UNDER 18 YEARS OF AGE, YOU MAY NOT USE OR ACCESS THE SERVICES AT ANY TIME OR IN ANY MANNER.

Protecting the privacy of young children is especially important. For that reason, we do not knowingly collect or maintain Data from persons under 16 years of age. If we learn that Data of persons under 16 years of age has been collected by us on or through the Services, we are committed to take the appropriate steps to delete such information.

## **Changes to the Policy**

We are constantly seeking to improve our privacy practices. Accordingly, we may amend, change, update or modify this Policy from time to time.

Any such change, update or modification will be effective immediately upon posting and will apply to any cause of action arising after the effective date of the change.

You are solely responsible for checking the Policy for updates or changes, and we recommend you do so on an ongoing basis to ensure that you agree with its updated terms. You can easily discern if any changes have been made in the Policy by checking the "Last Updated" date at the top of the Policy.

If we make material changes in the way we process information or in the purposes for which we process the information, we will notify you by email or through the App.

Your continued use of our Services following the posting of changes to this Policy or receipt of notice, whichever occurs first, means that you accept those changes.

## **Contact**

You can address any question or concern you may have with regard to this Policy, or if you have a reason to believe that your privacy or the privacy of your Data has been compromised, to our data protection officer by sending an email to: **[info@onedeads.com](mailto:info@onedeads.com)**

You can also contact your local data protection authority for any inquiry or complaint.